



**REDACTED – FOR PUBLIC INSPECTION**

October 11, 2017

**Via Email to TRSreports@fcc.gov and Hand Delivery**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

**Re: Request for Confidential Treatment  
Notification of Non-Substantive Change to ClearCaptions' Ownership  
Structure  
CG Docket Nos. 03-123 & 10-51**

Dear Ms. Dortch:

ClearCaptions, LLC ("ClearCaptions" or "Company") respectfully requests confidential treatment of certain confidential information contained in the enclosed notification of non-substantive change in the chain of ownership structure in the Company (the "Notice") pursuant to the *Protective Order* in the above-captioned proceedings and in accordance with Sections 0.457 and 0.459 of the Federal Communications Commission's ("FCC" or "Commission") rules.<sup>1</sup> The Notice concerns non-substantive changes to the chain of ownership structure in ClearCaptions which do not affect the ultimate ownership previously disclosed to the Commission.<sup>2</sup> ClearCaptions is also submitting a redacted version of the Notice pursuant to the *Protective Order*.<sup>3</sup>

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<sup>1</sup> See *Structure and Practices of the Video Relay Service Program and Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Protective Order, CG Docket Nos. 10-51 and 03-123, DA-12-402, 27 FCC Rcd 2557 (rel. Mar. 14, 2012) ("*Protective Order*"); 47 C.F.R. §§ 0.457, 0.459.

<sup>2</sup> See ClearCaptions, LLC, Notification of Non-Substantive Change to ClearCaptions' Ownership Structure, CG Docket Nos. 10-51 and 03-123 (Mar. 9, 2017), *amended by* Erratum to ClearCaptions, LLC, Notification of Non-Substantive Change to ClearCaptions' Ownership Structure, CG Docket Nos. 10-51 and 03-123 (Apr. 18, 2017).

<sup>3</sup> *Protective Order* ¶ 9. Pursuant to guidance from the staff, ClearCaptions has filed the redacted version of this filing in CG Docket No. 03-123 only as CG Docket No. 10-51 pertains to Video Relay Service.



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ClearCaptions requests confidential treatment of all information contained after the heading **\*\*\*BEGIN CONFIDENTIAL\*\*\*** and before the heading **\*\*\*END CONFIDENTIAL\*\*\***. As described below, all material contained inside those headings is proprietary commercial and business information that is not customarily disclosed to the public or within the industry and is subject to Exemption 4 under the Freedom of Information Act (FOIA).<sup>4</sup> The confidential information has been redacted from the version electronically filed with the Commission, which is being separately filed.

**1. Identification of the specific information for which confidential treatment is sought.**

ClearCaptions requests confidential treatment of all information contained after the heading **\*\*\*BEGIN CONFIDENTIAL\*\*\*** and before the closing heading **\*\*\*END CONFIDENTIAL\*\*\***, which has been redacted in the version of this Notice filed electronically with the Commission.

**2. Identification of the circumstances giving rise to the submission.**

ClearCaptions is submitting the enclosed Notice to provide current information to the Commission regarding the current chain of ownership structure in Clear Captions as a result of non-substantive changes thereto.

**3. Explanation of the degree to which the information is commercial or financial or contains a trade secret or is privileged.**

The confidential information in the enclosed Notice is sensitive commercial information specific to the corporate structure of ownership in ClearCaptions. This information is generally safeguarded from competitors and is not made available to the public.

**4. Explanation of the degree to which the information concerns a service that is subject to competition.**

The confidential information concerns Internet Protocol captioned telephone service, a nationwide competitive service.

**5. Explanation of how disclosure of the information could result in substantial competitive harm.**

Disclosure of the confidential information could cause substantial competitive harm

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<sup>4</sup> 5 U.S.C. § 552(b)(4).



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to ClearCaptions because it would provide competitors with insight into ClearCaptions' confidential corporate and structural information that is not generally available in the market, which would work to ClearCaptions' severe competitive disadvantage. ClearCaptions is a privately held entity.

**6. Identification of any measures taken by the submitting party to prevent unauthorized disclosure.**

ClearCaptions routinely treats the confidential information as confidential and exercises significant care to ensure that such information is not inadvertently disclosed to its competitors or the public.

**7. Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties.**

ClearCaptions does not make the confidential information available to the public, and this information is not generally disclosed to third parties.

**8. Justification of the period during which the submitting party asserts that the material should not be available for public disclosure.**

ClearCaptions requests that the confidential information be treated as confidential on an indefinite basis as it cannot identify a date certain on which this information could be disclosed without causing competitive harm to ClearCaptions.

If a request is submitted for disclosure of this information, please provide sufficient notice to the undersigned to allow ClearCaptions to take appropriate steps to safeguard the confidentiality of the information. In addition, should this request for confidentiality be denied, ClearCaptions requests that this information be returned by the Commission without consideration.



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Respectfully submitted,

/s/ Michael Strecker

Michael Strecker  
Vice President of Regulatory and  
Strategic Policy  
ClearCaptions, LLC  
595 Menlo Drive  
Rocklin, CA 95765  
(916)274-8429  
Mike.strecker@clearcaptions.com

cc: Eliot Greenwald



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Mr. Eliot J. Greenwald  
Deputy Chief, Disability Rights Office  
Consumer and Governmental Affairs Bureau  
Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

**Re: Notification of Non-Substantive Change to ClearCaptions' Ownership Structure**  
**CG Docket Nos. 03-123 & 10-51**

Dear Mr. Greenwald:

ClearCaptions, LLC ("ClearCaptions" or "Company") hereby notifies the Federal Communications Commission ("FCC" or "Commission") that, effective beginning August 12, 2017, ClearCaptions' chain of ownership structure has undergone the following non-substantive organizational changes.

First, on August 12, 2017, VRS-CC Intermediate Holding Co. Inc. ("Parent Co"), the holder of **\*\*\*BEGIN CONFIDENTIAL\*\*\* \*\*\*END CONFIDENTIAL\*\*\*** of the units of ClearCaptions, created a new, wholly-owned subsidiary named ClearCaptions Intermediate, LLC ("CCI LLC"). Subsequently, Parent Co. contributed units representing **\*\*\*BEGIN CONFIDENTIAL\*\*\* \*\*\*END CONFIDENTIAL\*\*\*** ownership of the Company, into CCI LLC. Parent Co. retained units of the Company representing **\*\*\*BEGIN CONFIDENTIAL\*\*\* \*\*\*END CONFIDENTIAL\*\*\*** ownership thereof. Parent Co. also owns **\*\*\*BEGIN CONFIDENTIAL\*\*\* \*\*\*END CONFIDENTIAL\*\*\*** of the units of CCI LLC, which owns the remaining **\*\*\*BEGIN CONFIDENTIAL\*\*\* \*\*\*END CONFIDENTIAL\*\*\*** of the Company. See Exhibit 2.

Second, on or about October 10, 2017, Parent Co. was converted from a Delaware corporation to a Delaware limited liability company. Also on or about October 10, 2017, **\*\*\*BEGIN CONFIDENTIAL\*\*\* \*\*\*END CONFIDENTIAL\*\*\***. See Exhibit 3.

Exhibit 4 reflects the final state of the chain of ownership structure in ClearCaptions effective as of October 10, 2017.



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ClearCaptions does not expect this non-substantive change to affect its compliance with the mandatory minimum standards applicable to its provision of Internet Protocol captioned telephone service.

Respectfully submitted,

/s/ Michael Strecker

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Vice President of Regulatory and  
Strategic Policy  
ClearCaptions, LLC  
595 Menlo Drive  
Rocklin, CA 95765  
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Mike.strecker@clearcaptions.com



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**Exhibit 1**

**Prior Chain Of Ownership Structure In ClearCaptions**

**\*\*\*BEGIN CONFIDENTIAL \*\*\***

**\*\*\*END CONFIDENTIAL \*\*\***



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**Exhibit 2**

**Chain Of Ownership Structure In Clear Captions As Of August 12, 2017**

**\*\*\* BEGIN CONFIDENTIAL \*\*\***

**\*\*\*END CONFIDENTIAL INFORMATION\*\*\***

1. On August 12, 2017, Parent Co.:
  - a. Created CCI LLC as a wholly-owned subsidiary, and
  - b. Contributed **\*\*\*BEGIN CONFIDENTIAL\*\*\*** **\*\*\*END CONFIDENTIAL\*\*\*** of units of the Company into CCI LLC
2. As a result of these changes, the Company's units are owned **\*\*\*BEGIN CONFIDENTIAL\*\*\*** **\*\*\*END CONFIDENTIAL\*\*\*** by CCI LLC and **\*\*\*BEGIN CONFIDENTIAL\*\*\*** **\*\*\*END CONFIDENTIAL\*\*\*** by Parent Co.





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**Exhibit 3**

**Chain Of Ownership Structure In ClearCaptions As Of October 10, 2017**

**\*\*\*BEGIN CONFIDENTIAL\*\*\***

**\*\*\* END CONFIDENTIAL \*\*\***

1. On or about October 10, 2017:
  - a. Parent Co. was converted from a Delaware corporation into a Delaware limited liability company
  - b. **\*\*\*BEGIN CONFIDENTIAL\*\*\* \*\*\*END CONFIDENTIAL\*\*\*.**



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**Exhibit 4**

**Final Chain Of Ownership Structure In ClearCaptions Effective October 10, 2017**

**\*\*\* BEGIN CONFIDENTIAL \*\*\***

**\*\*\*END CONFIDENTIAL\*\*\***